

### **REMARKS**

Claims 1-12 are pending. Claims 1-12 stand rejected. By this Amendment, claims 1 and 3 have been amended. The amendments made to the claims do not alter the scope of the claims, nor have these amendments been made to define over the prior art. Rather, the amendments to the claims have been made to improve the form thereof. In light of the amendments and remarks set forth below, Applicants respectfully submit that each of the pending claims is in immediate condition for allowance.

Claim 3 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Claim 3 is amended to recite that the second gas channel is disposed at an edge of the plate and a second gas outlet opening for the second gas channel is directed towards the edge of the plate. As such, the rejection under 35 U.S.C. § 112, second paragraph, has been overcome and Applicants respectfully request reconsideration and withdrawal of the rejection.

Claims 1-5 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,984,165 ("Inoue"). Applicants request reconsideration and withdrawal of this rejection.

To anticipate a claim under 35 U.S.C. § 102, the cited reference must disclose every element of the claim, as arranged in the claim, and in sufficient detail to enable one skilled in the art to make and use the anticipated subject matter. See, PPG Industries, Inc. v. Guardian Industries Corp., 75 F.3d 1558, 1566 (Fed. Cir. 1996); C.R. Bard, Inc. v. M3 Sys., Inc., 157 F.3d 1340, 1349 (Fed. Cir. 1998). A reference that does not expressly disclose all of the elements of a claimed invention cannot anticipate unless all of the undisclosed elements are inherently present in the reference. See, Continental Can Co. USA v. Monsanto Co., 942 F.2d 1264, 1268 (Fed. Cir. 1991).

Among the limitations of independent claim 1 not present in the cited reference is “a flushing device including a plate with a window, a first gas channel and a first gas outlet opening arranged at the window, the flushing device being aligned parallel to a transporting area of the clamping device intended for the wafer to be held in position above the clamping device.”

As shown in Figure 2 of Inoue, there is no flushing device as explicitly recited in the claim. As shown, the flushing device in Inoue is C-shaped and encapsulates the edges of board 1. The shield plate 80, which includes a refrigerant passage 81, blow out passage 82, and blow out holes 83 are not parallel to the transport area as explicitly recited in the claim. In fact, the entire assembly is bent to accommodate the IO pins 5 on board 8.

As shown in Figure 1 of the present application, gas channel 8 provides a forming gas and gas channel 11 provides a cooling gas. We note that in Inoue, the passage 81 provides either a nitrogen gas to prevent oxidation or a helium gas for forcibly cooling the bonding area (see Inoue col.9, lns. 25-32).

Thus, for the reasons above, we respectfully submit that claim 1 and its dependent claims 2 through 8 are allowable.

Claims 6-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Inoue in view of U.S. Patent No. 6,288,376 (“Tsumura”). We note that whether or not Tsumura includes the limitations for which it is cited, Tsumura fails to cure the deficiencies in Inoue noted above. Therefore, claims 6-8 are allowable over the cited combination for these additional reasons.

Claims 9-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over GB 244374 (“Rosser”) in view of U.S. Patent No. 6,334,567 (“Xie”). Among the

limitations of independent claim 9 not present in the cited reference is heating the chip from a side opposite the contact of the chip to melt with solder.

As shown in Figure 1 of Rosser, the chip 21 is heated from the contact side so that solder 19 is melted between the chip 21 and the substrate 13. As such, Rosser fails to disclose this explicitly recited limitation. The inclusion of Xie fails to cure this deficiency. As such, claims 9-11 are allowable.

Claims 4-8 depend either directly or indirectly from, and contain all the limitations of claim 1. These dependent claims also recite additional limitations which, in combination with the limitations of claim 1, are neither disclosed nor suggested by the cited references and are also believed to be directed towards the patentable subject matter. Thus, claims 4-8 should also be allowed.

Because none references cited by the Examiner disclose each and every limitation of the claims either alone or in combination, we respectfully submit that each of the claims is in immediate condition for allowance.

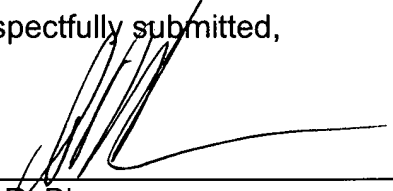
Applicants have responded to all of the rejections and objections recited in the Office Action. Reconsideration and a Notice of Allowance for all of the pending claims are therefore respectfully requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

If the Examiner believes an interview would be of assistance, the Examiner is welcome to contact the undersigned at the number listed below.

Dated: January 19, 2007

Respectfully submitted,



By  
Ian R. Blum

Registration No.: 42,336  
DICKSTEIN SHAPIRO LLP  
1177 Avenue of the Americas  
New York, New York 10036-2714  
(212) 277-6500  
Attorney for Applicants

IRB/mgs